

I. MOTION

On January 31, 2006, Berkley filed a Renewed Motion for Summary Judgment and a Renewed Motion to Strike. On that same day, three additional motions for summary judgment were filed against Defendants by the other parties to this matter. In order to properly rebrief each of the responses to the pending motions, Sales Support seeks to stagger response times to the various motions. Berkley has agreed to a one week extension of the time for Sales Support to file responses to its motions. This extension would permit Sales Support to file three responses on the original due date and two additional responses the following week. Given the magnitude of the briefing and review, Sales Support does not anticipate that such an extension would result in a delay to the overall litigation. Sales Support had intended to seek this relief from the Court prior to this date, however, counsel for Berkley was ill and unavailable last week. Preferring to file this motion as agreed, Sales Support waited until it was able to get the consent of respondent.

II. BRIEF IN SUPPORT

The Court has discretion to manage its docket as it sees fit in the interests of justice and judicial economy. This extension will promote judicial efficiency by permitting Defendants to properly prepare briefing that will be of assistance to the Court. This motion is timely filed and is sought not for purposes of delay but so that justice may be done. As such, Defendants request this Court grant this motion in its entirety and any further relief to which they may show themselves entitled.

III. RELIEF REQUESTED

Wherefore, Defendants respectfully request that the Court grant Defendants' Motion to

Extend Time to File Response to Response to Berkley Risk Manager's Renewed Motion for Summary Judgment and Berkley Risk Manger's Renewed Motion to Strike Answer and extend such date to February 28, 2006.

Respectfully submitted,

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Agreed:

/s/Bob Candee
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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of February, 2006 a true and correct copy of the foregoing document was served via the Federal Court ECF System on the following:

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